

Modern Slavery statement for financial year 2020/21

This statement is made pursuant to s.54 of the Modern Slavery Act (2015) and sets out the steps that the NHS Derby & Derbyshire Clinical Commissioning Group has taken and will continue to take to ensure that Modern Slavery or human trafficking is not taking place within our organisation, commissioned services, business, or supply chain.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. The NHS Derby & Derbyshire CCG have a zero tolerance approach to any form of abuse and thus Modern Slavery is incorporated within both children's and adult's safeguarding work streams. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of Modern Slavery across the NHS and Associated Care Sectors.

Our core business as a Clinical Commissioning Group

The key priorities for the CCG are two-fold:

1. Through the implementation of robust HR recruitment policies and procedures the CCG ensure that comprehensive checks and balances are in place to negate the likelihood of individuals being employed by the CCGs, who have been trafficked or who are the victims of Modern Slavery.
2. The NHS Derby & Derbyshire Clinical Commissioning Group are responsible for buying NHS Services for people living in Derbyshire and Derby City, based upon the health needs of our population. The CCG is also responsible for monitoring the quality of services and care provided to those patients. The CCG will therefore ensure that all commissioned service providers are aware of their responsibilities and have effective systems in place to demonstrate that they too have a zero tolerance to human trafficking and are compliant with the Modern Slavery Act (2015).

Our high risk areas

Potential risk areas have been identified as;

1. The recruitment of temporary or agency staff within NHS care provider services
2. Private Residential & Nursing Care Sector

This risk is mitigated through Quality Assurance audits and visits and by it being an integral part of multi-agency strategies including the development of policy and the content of staff induction and training programmes.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Modern Slavery statement contained within the Children & Adult Safeguarding Adult Policy. These policies set out the Organisation's stance on Modern Slavery and explain how employees can identify any instances of this and where they can go for help.
2. Safe Recruitment policy. We operate a robust safe recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
5. Children's Safeguarding Policy & Procedures.
6. Adult Safeguarding Policy & Procedures.

Our NHS Provider Services

The NHS Derby & Derbyshire CCG conducts due diligence on all commissioned services before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offences relating to Modern Slavery. Through safeguarding assurance frameworks and in partnership with key stakeholders we obtain evidence that NHS care providers are compliant with Modern Slavery safeguards and demonstrate robust and consistent staff recruitment policies and procedures.

As part of our contract with NHS providers, we require that they confirm to us that:

1. They have taken steps to eradicate Modern Slavery within their organisation.
2. They hold their own recruitment suppliers to account over Modern Slavery.
3. They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. We may terminate the contract or escalate the concern to relevant external governing bodies at any time should any instances of Modern Slavery come to light.

Training

We regularly conduct training for our commissioners so that they understand the signs of Modern Slavery and what to do if they suspect that it is taking place within, or external to, our business. This is incorporated within mandatory safeguarding training strategy. As part of our quality assurance schedule NHS providers demonstrate that they are meeting their statutory obligations and have included Modern Slavery as part of their training programmes.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain through:

- No allegations, complaints, whistleblowing reports received from employees, the public, or law enforcement agencies to indicate that Modern Slavery practices have been identified.
- Quality Assurance returns from NHS providers evidencing compliance.
- Liaison with Care Quality Commission to share intelligence and outcomes from assurance visits and submissions.
- Liaison with key stakeholders including Police and Designated Leads.

Approval for this statement

Approved on behalf of NHS Derby & Derbyshire CCG Governing Body:

Name: Dr Chris Clayton

Signature: 

Date: 21.07.2020